

# **EXHIBIT B**

1 wouldn't say prototype -- development phase.

2 Q. Do you have a prototype working that  
3 includes groove scanning?

4 A. Of a key cutting -- a prototype? Yeah.  
5 I guess I'd have to ask you to clarify.

6 Q. Well, something that you're testing.  
7 I don't know. I'm not sure how you --

8 A. Sorry.

9 Q. A machine that's been built that  
10 you're testing. With that definition of  
11 prototype, do you have a prototype of a key  
12 identification machine that includes groove  
13 scanning?

14 A. Yes.

15 Q. Okay. And what are the results thus  
16 far?

17 A. That we appear to be able to identify  
18 keys based on the milled grooves.

19 Q. Is it groove scanning in combination  
20 with backlighting?

21 A. There's -- yeah.

22 Q. Okay. So you have two light sources,

1 basically; is that right?

2 MR. WALTERS: Objection. Counsel,  
3 you're wandering far afield for where we're at  
4 for today's deposition or where we're supposed to  
5 be per our agreement.

6 MR. ISAAC: Well, it's my time, and I  
7 think I'm entitled to use it --

8 MR. WALTERS: No, no. No, no. It's not  
9 necessarily your time. We've bifurcated this  
10 case to talk about the '894 patent during this  
11 phase of the litigation.

12 MR. ISAAC: Actually, Mr. Walters, the  
13 agreement was, we have another opportunity to  
14 depose witnesses in connection with second  
15 patents. There's no prohibition of me doing  
16 anything. And, frankly, if they're in the  
17 prototype stage, I'm entitled to find out what  
18 that is. I need to figure out how that will then  
19 -- I'll ask him next if they changed the  
20 mechanics because of that.

21 MR. WALTERS: Great. Can't wait for  
22 you to get to that part of your questioning.